Privacy Policy

This Privacy Policy sets out the rules under which we protect personal data collected and processed by us.

Compliance with Laws

We comply with the applicable laws and regulations for the protection of personal data. All personal data collected by us will be used for the purposes set forth herein only.

The Kind, Purpose of Use and Legal Grounds of Collection and Process of Personal Data

(1) Customers and potential customers

(a) Personal data which we collect from customers and potential customers are as follows:

- Contact information (e.g., name, company name, address, phone number and email address) of relevant personnel of customers and potential customers

(b) We process personal data collected from customers and potential customers for the purposes set forth below:

- Contact with customers and potential customers for reasonable business purposes including business negotiations and discussions, performance of legal obligations and any other legitimate purposes;
- Promotion and sales activities;
- Process of order, delivery, claim, payment and any other transactional matters including performance of contracts; and
- Analysis of market, customers and likes for our products and services.

(c) Legal grounds for processing of personal data collected from customers and potential customers are as set forth below:

- Performance of contracts;
- Consents of data subjects;
- Compliance with legal obligations; and
- Legitimate interests of Santec Group Companies (defined below).

(d) We will delete personal data collected from a customer or a potential customers

when we become aware that the data subject has become irreverent to the business between Santec Group Companies (defined below) and such customer or potential customer (e.g., retirement of the data subject).

(2) Suppliers, vendors, contractors, distributors, and other business partners and potential business partners

(a) Personal data which we collect from trade partners and potential trade partners are as follows:

- Contact information (e.g., name, company name, address, phone number and email address) of relevant personnel of trade partner and potential trade partners

(b) We process personal data collected from trade partners and potential trade partners for the purposes set forth below:

- Contact with customers and potential customers for reasonable business purposes including business negotiations and discussions, performance of legal obligations and any other legitimate purposes; and
- Process of order, delivery, claim, payment and any other transactional matters including performance of contracts.

(c) Legal grounds for processing of personal data collected from trade partners and potential trade partners are as set forth below:

- Performance of contracts;
- Consents of data subjects;
- Compliance with legal obligations; and
- Legitimate interests of Santec Group Companies (defined below).

(d) We will delete personal data collected from a trade partner or a potential trade partner when we become aware that the data subject has become irreverent to the business between Santec Group Companies (defined below) and such trade partner or potential trade partner (e.g., retirement of the data subject).

(3) Employees

(a) Personal data which we collect from employees are as follows:

- Personal details, including any information that identifies the data subject and their personal characteristics, including: name, address, contact details, age, date of birth, sex, and physical description including images and voice recordings;
- Personal identifiers issued by a public authority, including passport details, national insurance numbers, identity card numbers, driving licence details;
- Nationality, VISA status, working permits and any other information with respect to the right to work;
- Family & dependents and related information including those concerning congratulations and condolence events;
- Education and training details & qualifications including references and other information from educational institutions;
- Carrier records including references from former employers;
- Employment details, including employment terms, recruitment and termination details, and attendance records;
- Records of jobs and services performed under employment in Santec Group Companies (as defined below) including performance appraisals, records of disciplinary actions and any noteworthy events in the course of employment;
- Information related to salary payments including those concerning various withholding items such as tax and social insurance; and
- Health information including sick leaves information, pre-recruitment medical examination, periodic medical check ups for employees, and any other information necessary or useful for safety and health of employees.

(b) We process personal data of employees for the purposes set forth below:

- Human resources managements;
- Performance of legal obligations as the employer; and
- Contact with the employees in connection with their jobs and duties.

Notwithstanding the foregoing, health data of employees are processed only in cases where the data subjects give express consent to processing or processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Santec Group Companies (defined below) such as obligation of occupational safety and health, and management of sick leaves.

(c) Legal grounds for processing of personal data of employees are as set forth below:

- Performance of contracts;
- Consents of data subjects;
- Compliance with legal obligations; and
- Legitimate interests of Santec Group Companies (defined below).

(d) We will delete personal data of an employee after the elapse of ten (10) years from termination of employment of such employee.

(4) Job Applicants

(a) Personal data which we collect from job applicants are as follows:

- Personal details, including any information that identifies the data subject and their personal characteristics, including: name, address, contact details, age, date of birth, sex, and physical description including images and voice recordings;
- Personal identifiers issued by a public authority, including passport details, national insurance numbers, identity card numbers, driving licence details;
- Nationality, VISA status, working permits and any other information with respect to the right to work;
- Family & dependents and related information;
- Education and training details & qualifications including references and other information from educational institutions;
- Carrier records including references from former employers;
- Any other information stated in CV (curriculum vitae), resume or other documents for job application submitted by applicants; and
- Health data including pre-recruitment medical examination.

(b) We process personal data of job applicants for the purposes of management of recruit process, assessment of applicants, and selection of applicants for employment. Health data of applicants shall be used solely for the purpose of checking whether the health conditions of applicants fit for the positions they would be assigned.

(c) Legal grounds for processing of personal data of applicants are as set forth below:

- Consents of data subjects;
- Compliance with legal obligations; and
- Legitimate interests of Santec Group Companies (defined below).

(d) We delete personal data of applicants who are not hired by us promptly after the completion of recruitment processes. Personal data of applicants who are hired by us will be retained and managed by us as personal data of employees.

(5) Cookies

(a) Our website uses cookies. Insofar as those cookies are not strictly necessary for the provision of [our website and services], we will ask you to consent to our use of cookies when you first visit our website. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

(b) We use cookies for the following purposes:

- authentication and status - we use cookies to identify you when you visit our website.
- personalization - we use cookies to store information about your preferences and to personalize our website for you.
- advertising - we use cookies [to help us to display advertisements that will be relevant to you.
- analysis - we use cookies to help us to analyze the use and performance of our website and services.
- cookie consent - we use cookies to store your preferences in relation to the use of cookies.
- other purposes shown in our cookie policy

(c) Third party cookies for targeting. Our service providers including advertisement agents use targeting cookies to gather information about your use of our website, if you consent to use of targeting cookies. Such information will be used by our service providers for personalization of advertisements reflecting your interests. Our service providers that use targeting cookies are listed in our cookie policy.

(d) Legal ground for processing of personal information collected by cookie is as set forth below:

- Consents of data subjects.

Provision and Sharing of Personal Data

(1) We may share your personal data with other Santec Group Companies (defined below) for the purposes of use set forth in this Privacy Policy. In such cases we and such other Santec Group Companies comply with the applicable laws and regulations with respect to protection of personal data.

(2) We may receive personal data from other Santec Group Companies (defined below) as a controller of such personal data. Such personal data shall be subject to this privacy policy and processed for the purposes set forth in this privacy policy.

Santec Group Companies

"Santec Group Companies" mean Santec Holdings Corporation and companies majority of whose voting securities or voting rights are held directly or indirectly by Santec Holdings Corporation. Santec Group Companies currently consist of the following companies:

- Santec Holdings Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec AOC Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec LIS Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec OIS Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec Japan Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- movu Japan Corporation

Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Aqumen Capital Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec Global Corporation
  Address: 400 Kelby Street Suite 1501 Fort Lee, NJ 07024, USA

- movu-inc. (d.b.a. Santec Photonics Laboratories, Silicon Valley)
  Address: 2350 Mission College Blvd, Suites 1165 & 1170 Santa Clara, CA 95054, USA

- Santec USA Corporation
  Address: 400 Kelby Street Suite 1501 Fort Lee, NJ 07024, USA

- Santec California Corporation
  Address: 4750 Calle Quetzal Camarillo, CA 93012, USA

- Santec Canada Corporation
  Address: 160 Michael Cowpland Dr Kanata, ON K2M 1P6, Canada

- Santec (Shanghai) Corporation, Ltd.
  Address: 307B,Yuexiu Building, 388 Fushan Road, Pudong New District, Shanghai 200122 China

- MOG Laboratories Pty Ltd
  Address: 49 University St, Carlton VIC 3053 Australia

- Santec Europe Ltd. UK Head Office
  Address: 99 Park Drive, Milton Park, Abingdon Oxfordshire, OX14 4RY

- Santec Europe Ltd. Czech Office
  Address: Impact Hub Zlín, tr. Tomase Bati 829, Zlin, 760 01, Czech Republic

- Santec Vienna GmbH
  Address: Spittelberggasse 3, Top 13, 1070 Wien, Austria

Contact with our Company

If you have any questions or complaints with respect to this Privacy Policy or our handling of your personal data, please feel free to contact us at the following URL:

- Santec Europe Ltd. Head Office
  Address: Grand Union Studios, 332 Ladbroke Grove, London W10 5AD
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

- Santec Europe Ltd. Czezh Office (our data protection representative in EEA)
  Address: Impact Hub Zlín, tr. Tomase Bati 829, Zlin, 760 01, Czech Republic
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

Use of Processor

We may outsource processing of personal data to third party processors. In such cases, we will have processors implement appropriate information security measures in such a manner that processing meet the requirements of the applicable laws and regulations.

Cross Border Transfers

We intend to transfer your personal data to Santec Group Companies in Japan relying on the adequacy decision of European Commission. Santec Group Companies in Japan may re-transfer to other Santec Group Companies outside of Japan or to third party processors outside of Japan in accordance with the applicable laws in Japan on the condition that your personal data are properly protected and used only for the limited purposes provided herein.

Data Security

We implement adequate technical and organizational security measures to protect your personal data from misuse, unauthorized access, leakage, loss, falsification and any other information security risks.

Rights of Data Subjects

Under the GDPR or UK GDPR, you (data subjects of personal data processed by us) have the following rights.

- The right to access your personal data processed by us.
- The right to request correction of your personal data if it is inaccurate or incomplete.

- The right to request deletion or removal of your personal data under certain conditions provided in the GDPR or UK GDPR, as the case may be.
- The right to restrict the use of your personal data subject to certain conditions provided in the GDPR or UK GDPR, as the case may be.
- The right to ask us to copy or transfer your personal data to you or an organization designated by you subject to certain conditions provided in the GDPR or UK GDPR, as the case may be.
- To object to how your information is used under certain limited conditions provided in the GDPR or UK GDPR, as the case may be.

If you would like to exercise the above-mentioned rights or you have inquiries about the above-mentioned rights, please contact us at the following email addresses:

- Santec Europe Ltd. Head Office
  Address: Grand Union Studios, 332 Ladbroke Grove, London W10 5AD
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

- Santec Europe Ltd. Czezh Office (our data protection representative in EEA)
  Address: Impact Hub Zlín, tr. Tomase Bati 829, Zlin, 760 01, Czech Republic
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

Withdrawal of Consent

You (data subjects of personal data processed by us) have the right to withdraw your consent to our collection and process of your personal data at any time. If you withdraw your consent, please contact us at the following email addresses:

- Santec Europe Ltd.
  Address: Grand Union Studios, 332 Ladbroke Grove, London W10 5AD
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

- Santec Europe Ltd. Czezh Office (our data protection representative in EEA)
  Address: Impact Hub Zlín, tr. Tomase Bati 829 , Zlin, 760 01, Czech Republic
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

Your withdrawal will not affect the lawfulness of our processing based on your consent before your withdrawal. Furthermore, we may continue processing your personal data

based on grounds for lawful processing other than your consent (e.g., performance of contracts and legitimate interests).

Complaint

You (data subjects of personal data processed by us) have the right to lodge a complaint to our process of your personal data with an applicable supervisory authority in your country.

Automate Processing

Your personal data will not be used through automated decision-making process including profiling.

Personal data of Person under 16 years old

If you are under 16 years old and you intend to provide your personal data to us, please obtain your guardian's consent before providing your personal data.